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Implementing SEA within Spatial Planning to Ensure Sustainable Geothermal Energy Development in Indonesia plementing SEA within Spatial Planning to Ensure Sustainable Geothermal Energy Development in Indonesia

Pre-workshop ITB
Ali Ashat

Outline

1. Understanding Strategic Environmental Assessment (SEA)
   a. What is SEA?
   b. Why Indonesia needs SEA?
   c. Who should conduct the SEA?
2. SEA is mandatory in Indonesia
   a. By Law, SEA is mandatory
   b. When or in what situation the SEA should be implemented
3. SEA implementation in Indonesia
   a. How to implement SEA for GTE plant allocation policy (phases)
   b. A brief SEA exercise

What is SEA for?

· Integrate environmental and sustainability issues into strategic options

· Help find ways for sustainability

SEA = GOOD STRATEGY

EIA = GOOD DESIGN

Maria R. Partidário, Strategic approaches to SEA

SEA and Policy-Plan-Program (PPP)
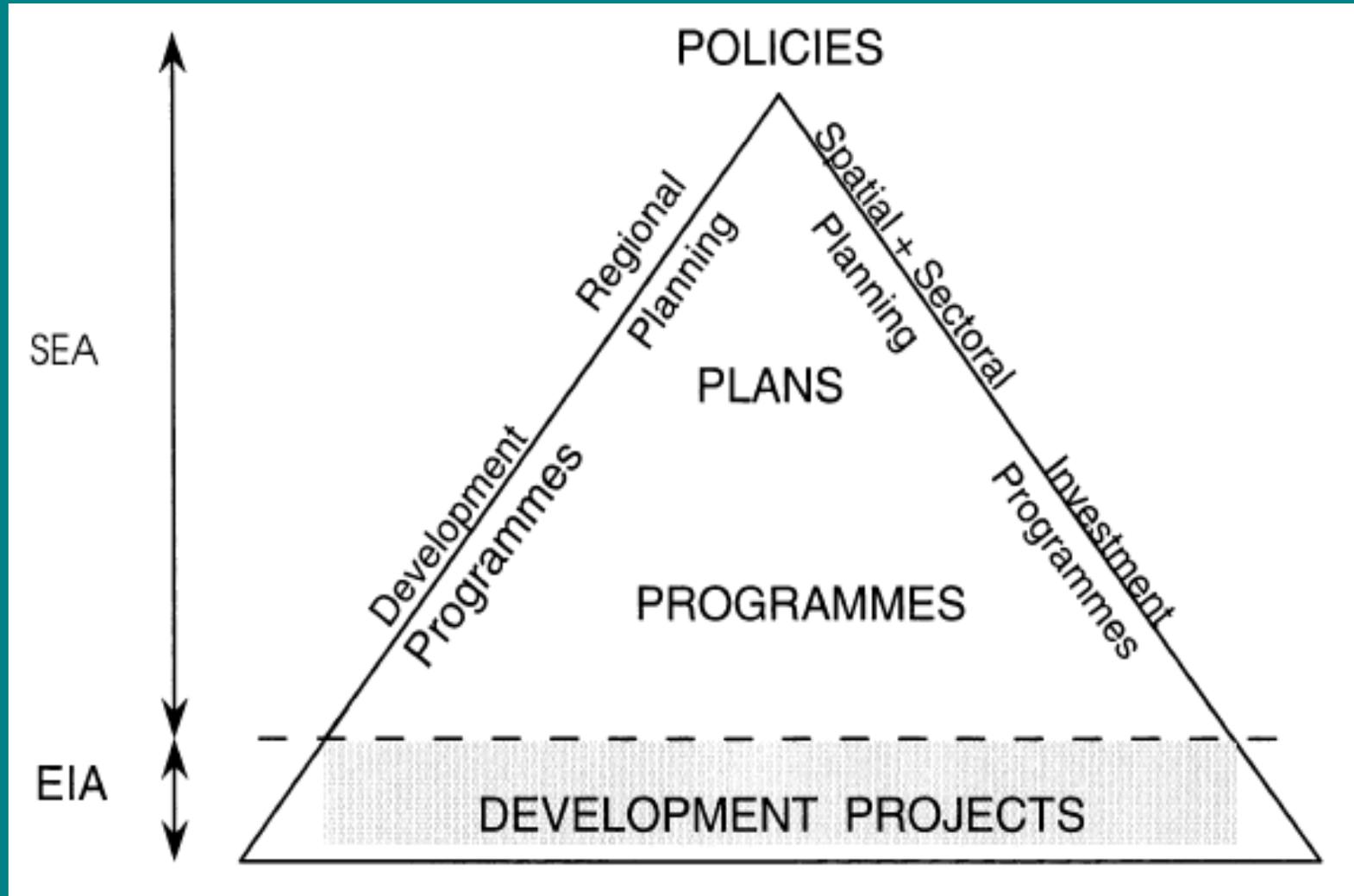
SEA is a strategic facilitator of sustainability process

Seven underlying principles of a strategic-based approach to SEA

1. Understand the strategy that is the object of SEA and the assessment context
2. Ensure a long-term horizon and a holistic, cross-sectoral and integrated perspective
3. Focus solely on critical factors for decision-making (preferentially between 3 and 8) and work with trends (processes) rather than current situations
4. Adopt an attitude that facilitates decision-making, supporting the decision-maker and encouraging sustainable decisions
5. Regularly inform decision-making in a strategic and pragmatic manner (in the critical decision-making windows), with the purpose of assisting decision-making
6. Use communication strategies, consider multiple perspectives and act through good governance
7. Ensure the tracking of decisions taken (monitoring and systematic review of objectives)

- The SEA methodology adopts a strategic approach based on a long-term, holistic and cross-sectoral perspective that is highly focused on few, though significant, factors of analysis that are strategic for decision-making
- The scope of SEA includes physical, ecological, social, cultural and economic aspects, to the extent that they are relevant in determining the quality of the context in which we live and the risks and opportunities for sustainable development. (Sadler, 2007)

# SEA: Enable to understand wider and more complex situation (more strategical than practical)
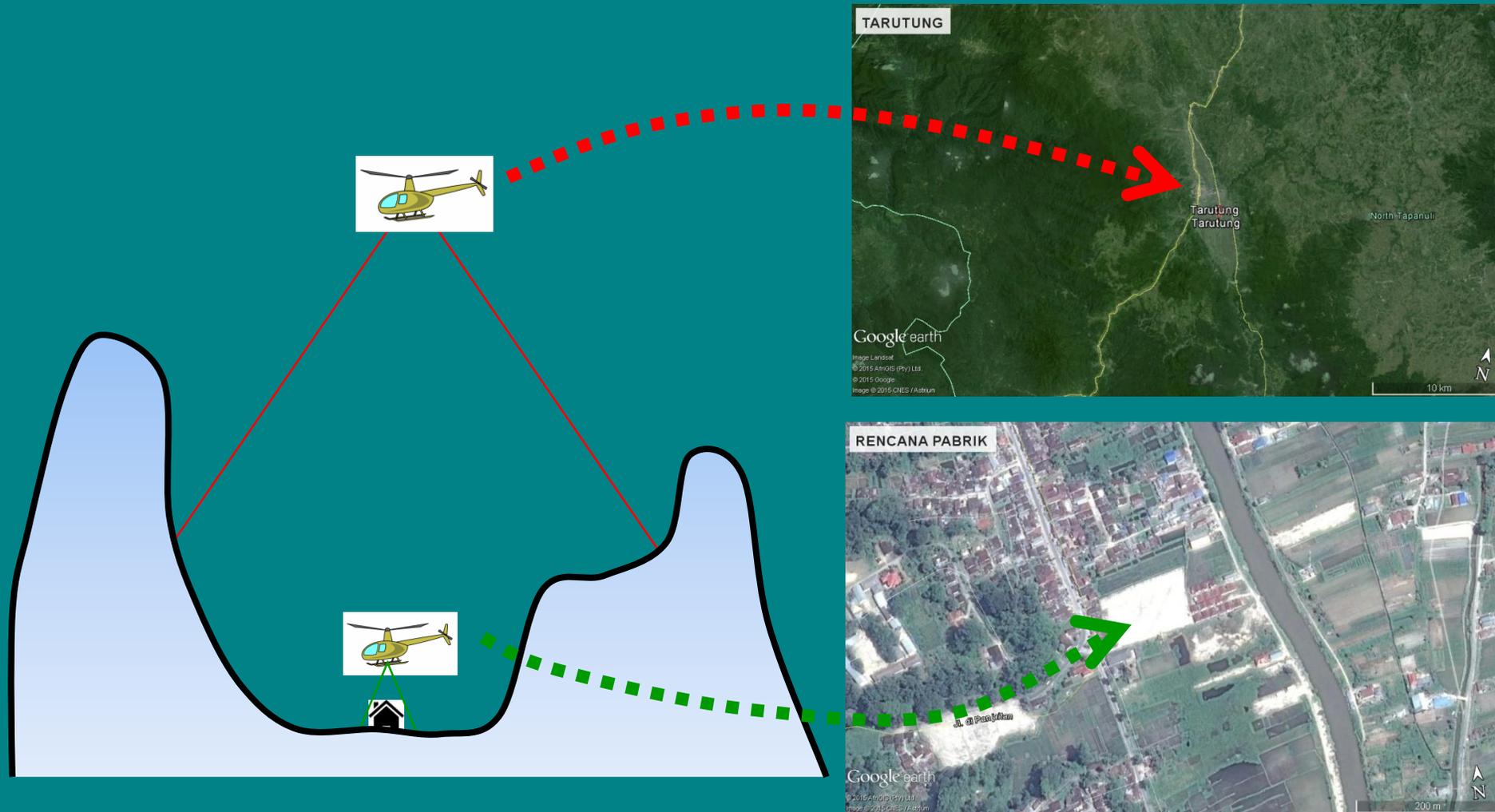
(Coal) Mining Activites and its inter-relation with other development sectors → an example of Stakeholder Mapping*)

Other government institutions (by sector line) , instead of Ministry of Energy and Mineral Resources (National and Local Development Policy Makers):

Board for Meteorology Climatology Geophysics

Forestry and Environmental

Industry

Transportation

Public Works & Housing

Rural Development

Spatial Planning and Land Use

Local Gov.ernment

Other parties,, instead of government institutions (Development Doers and Beneficiaries) such as:

Local Society (may represented by Local Leader)

NGOs

Private Sectors/ State-owned Company

RADIONUCLIDES

POLYCYLIC ORGANIC MATERIAL

PARTICULATES

PARTICLES

FUMES FROM FIRES

AIR

DUST

MINE WASTE

SLUDGE

FUMES FROM FIRES

DUST

PLANT WASTE

EXHAUST

ASH

SLUDGE

Topsoil Damage

OPEN-PIT MINING   UNDERGROUND MINING   BENEFICIATION   TRANSPORT   BURNING

TRUCK

UTILITY

Power Plant

INDUSTRY

TRAIN

Erosion and Floods Danger

BARGE

HOME

Land use changes and disruption, ecological displacement

Subsidence

PIPELINE

LAND

Waste disposal problem

WATER

Water consumption

Dissolved and suspended solids

Leachates

Dissolved solids

Water consumption

Acid mine drainage sedimentation chemical pollutants dissolved and suspended solids

Water

Sumber: Adapted from Mamurekli, 2010

*)

The Differentiation between SEA and EIA

In strategic model for SEA:	In traditional EIA terminology:
Critical decision factors	Scoping
Decision windows (in strategic process)	Planning phases
Trend analysis, Drivers of change, Context	Baseline
Strategic Options	Alternatives
Opportunities and risks	Impacts
Guidelines (planning, management)	Mitigation measures

Sumber: Partidario, 2012

Why Indonesia Need SEA?

- Resource depletion and environmental degradation remain occur
- Increasing Intensive development and multiplier development Impacts consequences; tend to uncontrolled and greater development risk
- Remaining low institution capabilities and un-easy to have strong stakeholders (actors) engagement in handling sustainable development issues
- SEA is mandatory for any development plan and spatial plan policies

KLHS/SEA definition by Law (Law no. 32/2009)

Kajian Lingkungan Hidup Strategis (KLHS) adalah serangkaian **analisis yang sistematis, menyeluruh, dan partisipatif** untuk memastikan bahwa **prinsip pembangunan berkelanjutan** telah menjadi dasar dan terintegrasi dalam pembangunan suatu wilayah dan/atau **kebijakan**, **rencana**, dan/atau **program.**
(Pasal 1, UU 32/2009)

ILMIAH (teknokratik)

HOLISTIK (sistemik)

Melibatkan Stakeholder

KETERKAITAN (internal, vertical, horizontal)

KESEIMBANGAN (ekonomi-sosbud-lingkungan)

KEADILAN (antar pokmas & generasi)

SEA is Mandatory by Law

Pemerintah dan pemerintah daerah **wajib** membuat KLHS dalam penyusunan atau evaluasi:

- Rencana tata ruang wilayah (RTRW) beserta rencana rincinya, **rencana pembangunan jangka panjang (RPJP), dan rencana pembangunan jangka menengah (RPJM)** nasional, **provinsi, dan/atau kabupaten/kota**; dan

- **Kebijakan, rencana**, dan/atau **program** yang berpotensi menimbulkan <u>**dampak**</u> dan/atau <u>**risiko**</u> lingkungan

Law no, 32/2009 on Environmental Protection and Management

article 15 (1) and (2)

SEA Implementation by Law

UU No. 32 Tahun 2009 tentang
Perlindungan dan Pengelolaan Lingkungan
Hidup

Permen LH No. 9 Tahun 2011 tentang
Pedoman Umum KLHS
(Idealnya PP)

PEMBANGUNAN DAERAH

TATA RUANG DAERAH

Permendagri No. 67/2012
tentang Pedoman Pelaksanaan
KLHS
dalam Penyusunan atau
Evaluasi
Rencana Pembangunan Daerah
(RPJPD, RPJMD, RENSTRA)

?

RTRW & Rencana Rinci
Provinsi, Kabupaten/Kota

# What are cross cutting issues being assessed in SEA?

Pasal 16 UU No. 32/2009, muatan KLHS antara lain:

- kapasitas daya dukung & daya tampung lingkungan hidup untuk pembangunan (carrying capacity)

- **perkiraan mengenai dampak dan risiko lingkungan hidup**; (environmental impacts)

- kinerja layanan/jasa ekosistem; (payment for environmental services)

- efisiensi pemanfaatan sumber daya alam; (natural resources efficiency)

- tingkat kerentanan & kapasitas adaptasi thd perubahan iklim; (vulnerability and adaptive capacity towards climate change)

- tingkat ketahanan dan potensi keanekaragaman hayati (biodiversity resiliency)

Source: Ministry of Home Affairs

Development Plan Basic Framework

Keinginan masy. terwujud dalam RPJP

Visi, Misi dan Tujuan dalam RPJP

RPJM 4
RKP 4
Tolok ukur kemajuan pemb. 5 thn-3

RPJM 3
RKP 3
Tolok ukur kemajuan pemb. 5 thn-2

Upaya yang dibutuhkan

RPJM 2
RKP 2
Tolok ukur kemajuan pemb. 5 thn.-1

RPJM 1
RKP 1

Kondisi keseluruhan saat ini

Waktu yang dibutuhkan untuk mencapai keinginan masyarakat (20 tahun)

Baseline/ mapping

Roadmap
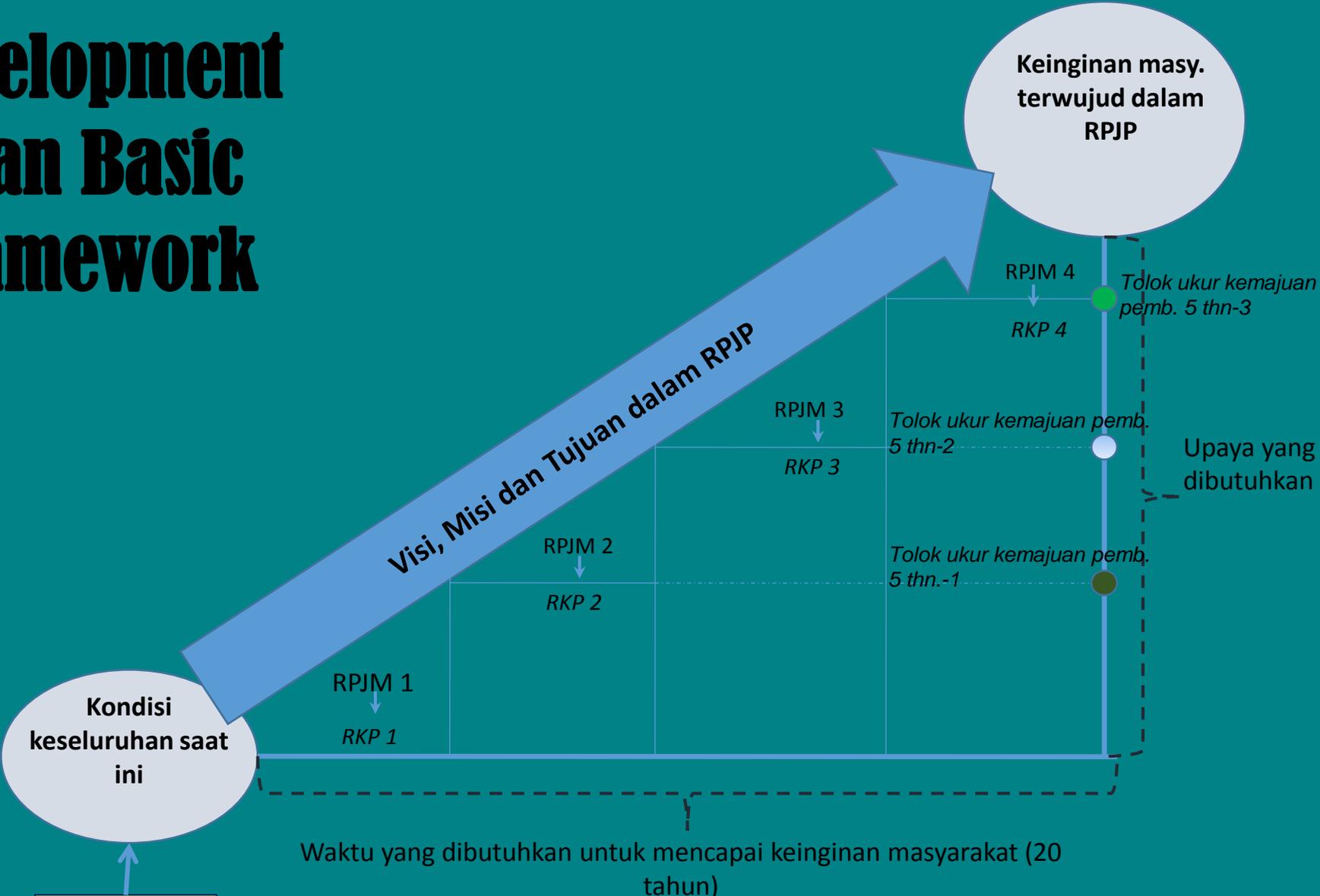
Long Term Development Plan; With and Without SEA (an illustration)

Critical Point for achieving Development Sustainability

RPJMD 5 thnan-4
Fase Unggulan:
VISI: TERDEPAN DAN BERKUALITAS (?)
? *Innovation*

Tingkat kesejahteraan, kemandirian dan ungulan

RPJMD 5 thnan-1
Fase Konsolidasi & membangun fondasi

RPJMD 5 thnan-2
Fase Pertumbuhan:

RPJMD 5 thnan-3
Fase Pengembangan :

?

Direct export (External growth)

Indirect export (internal growth)

| *Berapa banyak SDA yang dibutuhkan dan apa konsekuensi terhadap kondisi LH* | *Berapa banyak SDA yang dibutuhkan dan apa konsekuensi terhadap kondisi LH* | *Berapa banyak SDA yang dibutuhkan dan apa konsekuensi terhadap kondisi LH* | *Berapa banyak SDA yang dibutuhkan dan apa konsekuensi terhadap kondisi LH* |

Bagaimana antisipasi MITIGASI dan ADAPTASI 5 thn-1

Bagaimana antisipasi MITIGASI dan ADAPTASI 5 thn-2

Bagaimana antisipasi MITIGASI dan ADAPTASI 5 thn-3

Bagaimana antisipasi MITIGASI dan ADAPTASI 5 thn-4

Every development needs/deploy resources

Every development need mitigation or alternative for reaching equilibrium

Jika tanpa perbaikan, diperkirakan sulit mencapai kemandirian dan menjadi unggul serta lestari aset SDA/LH. Keberhasilan konsolidasi dan membangun fondasi pembangunan merupakan titik awal yang sangat menentukan pencapaian hasil tahapan pembangunan berikutnya

—— With SEA

••• Without SEA

Neraca Pembangunan Berkelanjutan berbasis SDA/LH masih negatif

Neraca Pembangunan Berkelanjutan (berbasis SDA/LH) positif

kapasitas pembangunan Berkelanjutan

Sustainable development

Unsustainable development

Sustainable road construction ← includes locating roads further away from the coastline, constructing bridges to allow fish passage ←, and using plant buffers 🌴🌳 to reduce erosion of sediment into the water, resulting in smaller sediment plumes 🌀 when it rains and clearer water. Sustainable agriculture 🌴🌱 will support local communities. Encouraging ecotourism developments 🛖 will also help prevent erosion and maintain water quality. These sustainable development principles will help protect livelihoods 🏚, traditional ways of life 🛖, and biodiversity 🐠🐟.

Unsustainable road construction ← includes locating roads too close to the coast, blocking fish passage up and down rivers 🐟, and cutting down all the trees and mangroves surrounding the road 🌾, which leads to a lot of sediment runoff 🔽 during rain events 🌧. Unsustainable mining practices include the operation of many strip mines with no plant buffers and no minesite rehabilitation 🏔. Unregulated tourism developments 🏨 will also increase erosion and harm water quality. Cutting down forests to plant palm oil plantations 🌴🌴 is another major source of sediment runoff into the water. Too much sediment in the water smothers corals 🪸 ,kills seagrasses ✂, and promotes growth of seaweeds and soft corals 🌿🦐.

Unsustainable communities
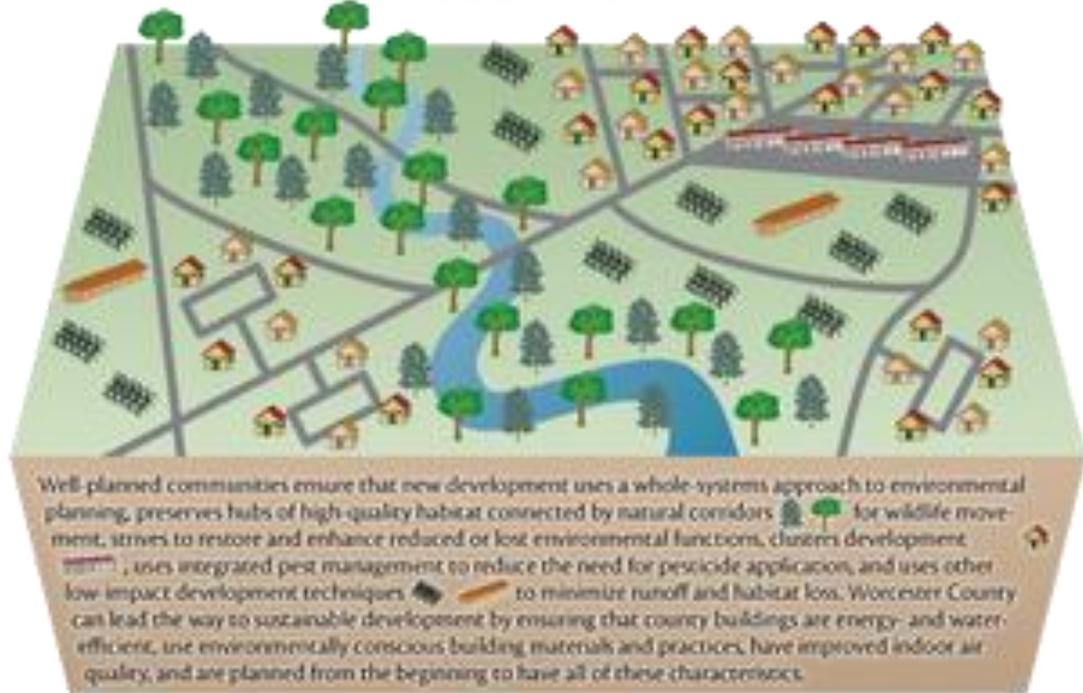
Poorly planned communities result in unmanaged urban sprawl, fragmenting forested and agricultural lands.

Sustainable communities

Well-planned communities ensure that new development uses a whole-systems approach to environmental planning, preserves hubs of high-quality habitat connected by natural corridors for wildlife movement, strives to restore and enhance reduced or lost environmental functions, clusters development, uses integrated pest management to reduce the need for pesticide application, and uses other low impact development techniques to minimize runoff and habitat loss. Worcester County can lead the way to sustainable development by ensuring that county buildings are energy- and water-efficient, use environmentally conscious building materials and practices, have improved indoor air quality, and are planned from the beginning to have all of these characteristics.

Basic Theory of Sustainable Development

**Institution
(Formal and Informal)**

Environment
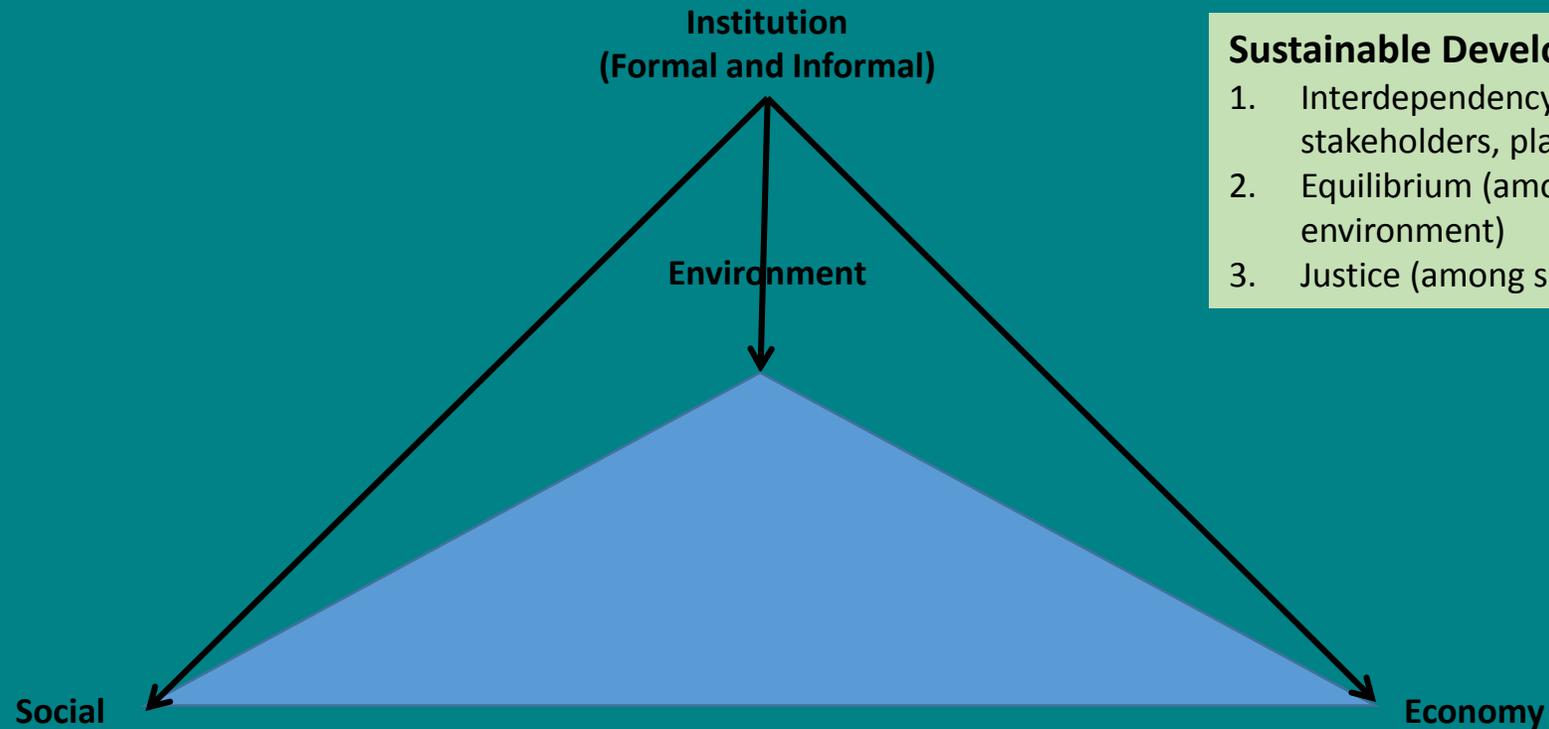
Social

Economy

Sustainable Development Principles:
1. Interdependency (sectors, regions, stakeholders, planning periods)
2. Equilibrium (among social, economy and environment)
3. Justice (among societies and generations)

Sustainable Development driven by Institutional Arrangement – UNDP (1997), Peet (1991), Mc Connell (1981)

It finds that while the role of local institutions is crucial for economic development and as a means of determining the returns of regional development policies, generating an institution-based general regional development strategy is likely to be undermined by the lack of definition of what are adequate, solid, and efficient institutions. Problems related to the measurement of institutions, to their space and time variability, to the difficulties for establishing the right mix of formal and informal institutions, and to the endogeneity between institutions and economic development make one-size-fits-all approaches to operationalizing institutions within regional development possibly unfeasible (Pose, 2009)

GTE and SEA through Spatial Plan

National Spatial Plan

Provincial Spatial Plan

Kabupaten Spatial Plan

Zonation Plan

GTE Allocation
Site Plan

Notes:
- Any power plant allocation is allocated within Local Government/Authority site
- Any power-plant site plan should refer and stated in spatial plan and development plan as well (national and local level)

# SEA for Synchronizing Spatial Plans towards Geothermal Energy Sector Development Plan; as designed on GEOCAP Project context

*) SEA is KLHS (Kajian Lingkungan Hidup Strategis) in Indonesia Policy Term.

SEA*) is mandatory for ensuring sustainable development principles integrated into Long-term Development Plan , Mid-term Dev. Plan, Spatial Planning (either at national or local level) and High Impacts Project Plan (Law 32/2009, article no. 15)

Laws and regulations: Law on Geothermal (21/2014), Law on Local Authority (32/2014), Law on Spatial Planning (26/2007), Law of Forestry (41/1999), Related Government Regulations, etc.

(WP 2.08; Geocap)

Laws and Policies Assessment

Geothermal Policy, Plan and Program
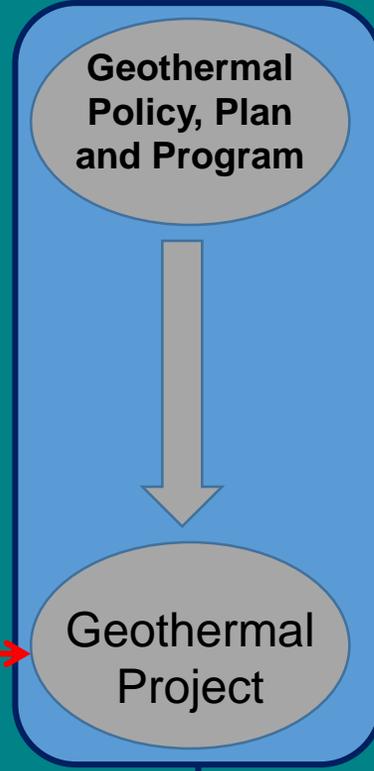
Recommendations

Geothermal Project

Geothermal Power Plant Wayang Windu as Case Study

Evaluation/ Assessment : SEA & EIA

(WP 1.08; Geocap)

geothermal
rain water — high voltage transmission line to grid — rain water
cooling tower — power station — separator
injection well — well
hot water
hot rock — hot rock
Courtesy of Star Energy
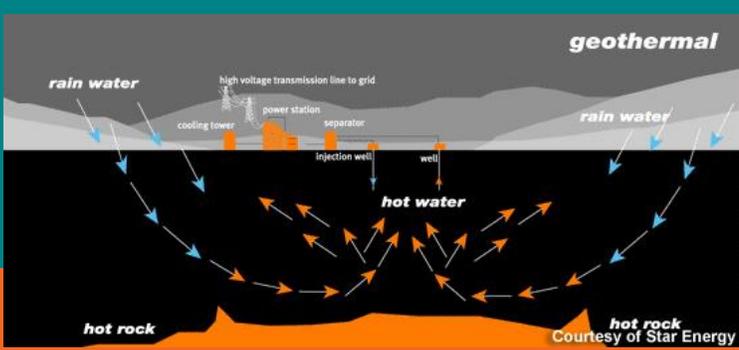
REGIONAL DEVELOPMENT, SPATIAL PLAN AND OTHER DEVELOPMENT PLANS

Some issues related to Geothermal power plant location and its multiplier impacts towards local and regional development, as well as environmental system

Policy Questions:
- *What strategic impacts may occurs in allocating Geothermal Power Plants in certain location?*
- *How to synchronized cross development sector lines and inter-regional/local development?*

Through SEA

Act Num. 25/2004 on National Development Planning System

PLANNING DOCUMENT HIERARCHY

Development Plan Concession (Musrenbang)

Act Num. 26/2007 on Spatial Planning

SPATIAL PLANNING HIERARCHY

NATIONAL
Long term → Mid-term

PROVINCE
Long term → Mid-term

REGION/URBAN
Long term → Mid-term

SECTORAL PROGRAMS

STRATEGIC PLAN

Energy Sector: Geothermal

1 : 1000.000
1 : 500.000
1 : 250.000
1 : 250.000
1 : 50.000
1 : 100.000
1 : 50.000
1 : 10.000
1 : 5.000

National Spatial Plan (Government Regulation Num. 26/2008)

Islands Spatial Plan (Perpres)

Local regulation on Provincial Spatial Plan

Presidential Regulation on National Strategic Area Spatial Plan

Local regulation on Regional Spatial Plan

Zoning Regulation

POLICY

Government Action Plan

Controlling Instrument

Insentives/ Disinsentives

Taxing, Profit Share Fund (DBH), General Allocation Fund(DAU), Special Allocation Fund (DAK)

: Geothermal Site Plan

15

Three alternative ways in conducting SEA

Menyatu (Embedded)

KLHS

RPJMD

KLHS dilakukan menyatu dalam penyusunan RPJMD (*embedded*)

Terpadu (Integrated)

RPJMD

KLHS

KLHS dilakukan saat penyusunan RPJMD sudah berjalan

RPJMD

KLHS

KLHS dilakukan paralel dan terintegrasi dengan proses penyusunan RPJMD
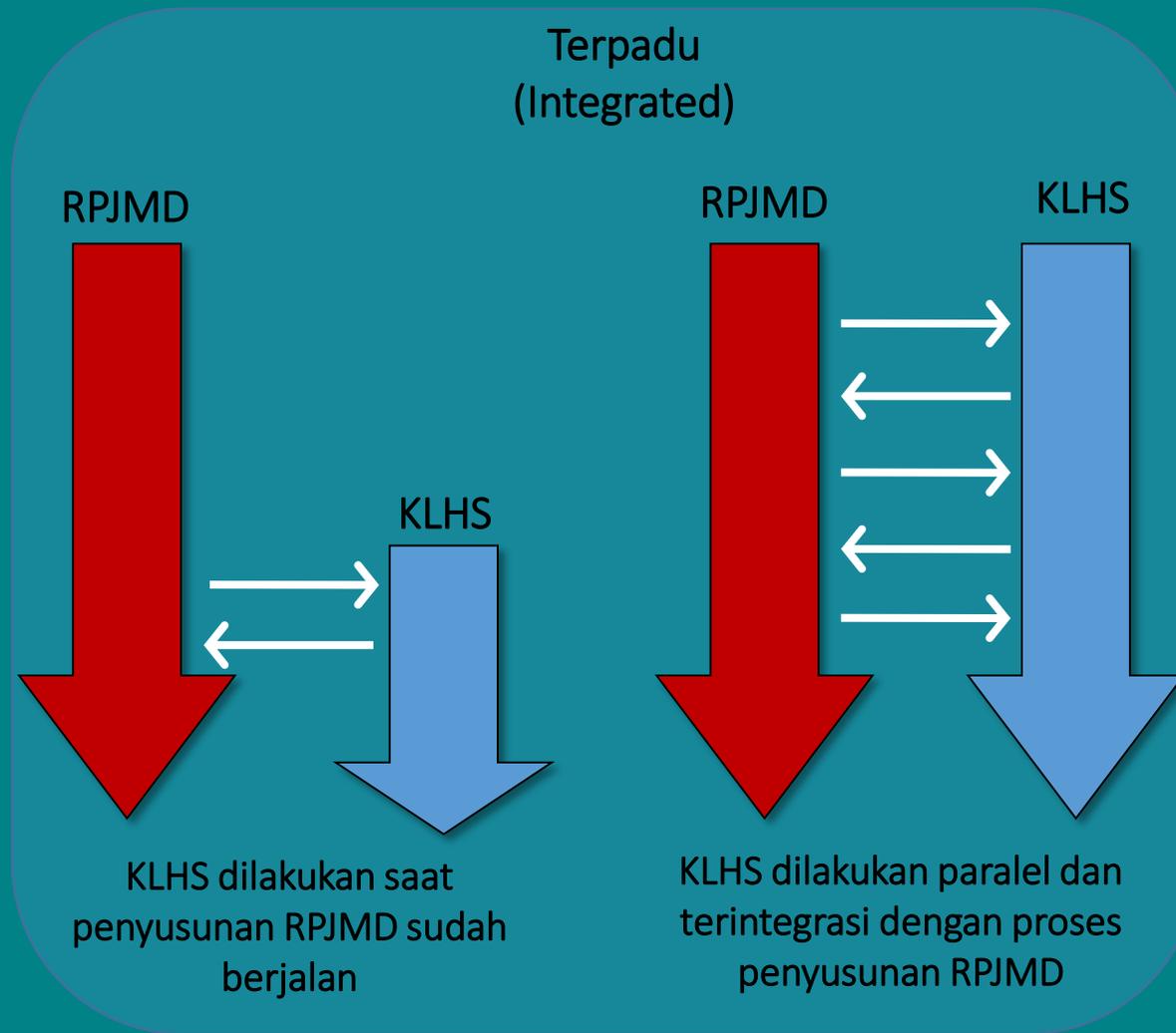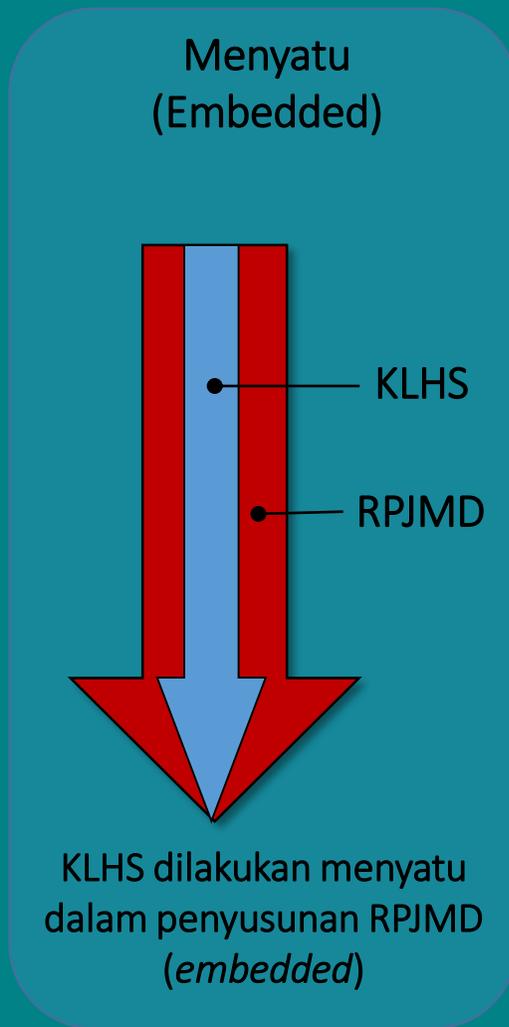
In Indonesia, SEA is using the Integrated Method; mainly due to the capacity in conducting SEA

Source: Ministry of Home Affairs

The logic of Impacts Assessment (SEA)

Un-Sustainable Communities

Existing Condition

Sustainable Development

Defining Main Strategic Issues

Defining Sustainable Strategic Issues

Sustainable Communities

Un-Sustainable Development | **Sustainable Development**

Assessing Sustainable Strategic Issues towards PPP; Identifying any possible sensitive impact towards sustainable development achievement
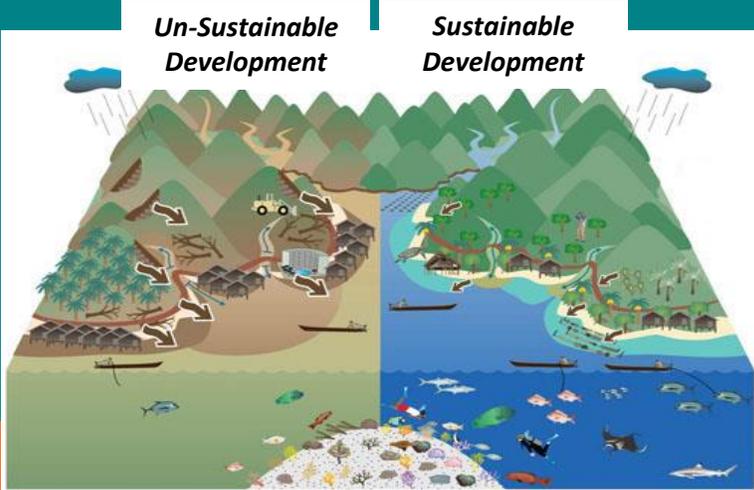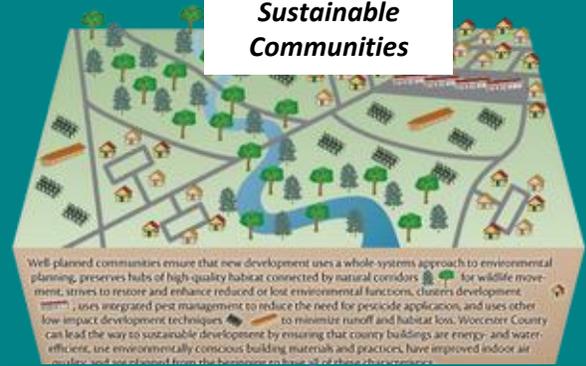
Defining any possible mitigation/adaptation and/or development alternative needed for ensuring sustainable development achievement

Three Main Steps in Implementing SEA in Indonesia Context and stated in the Law no. 32/2009 *)
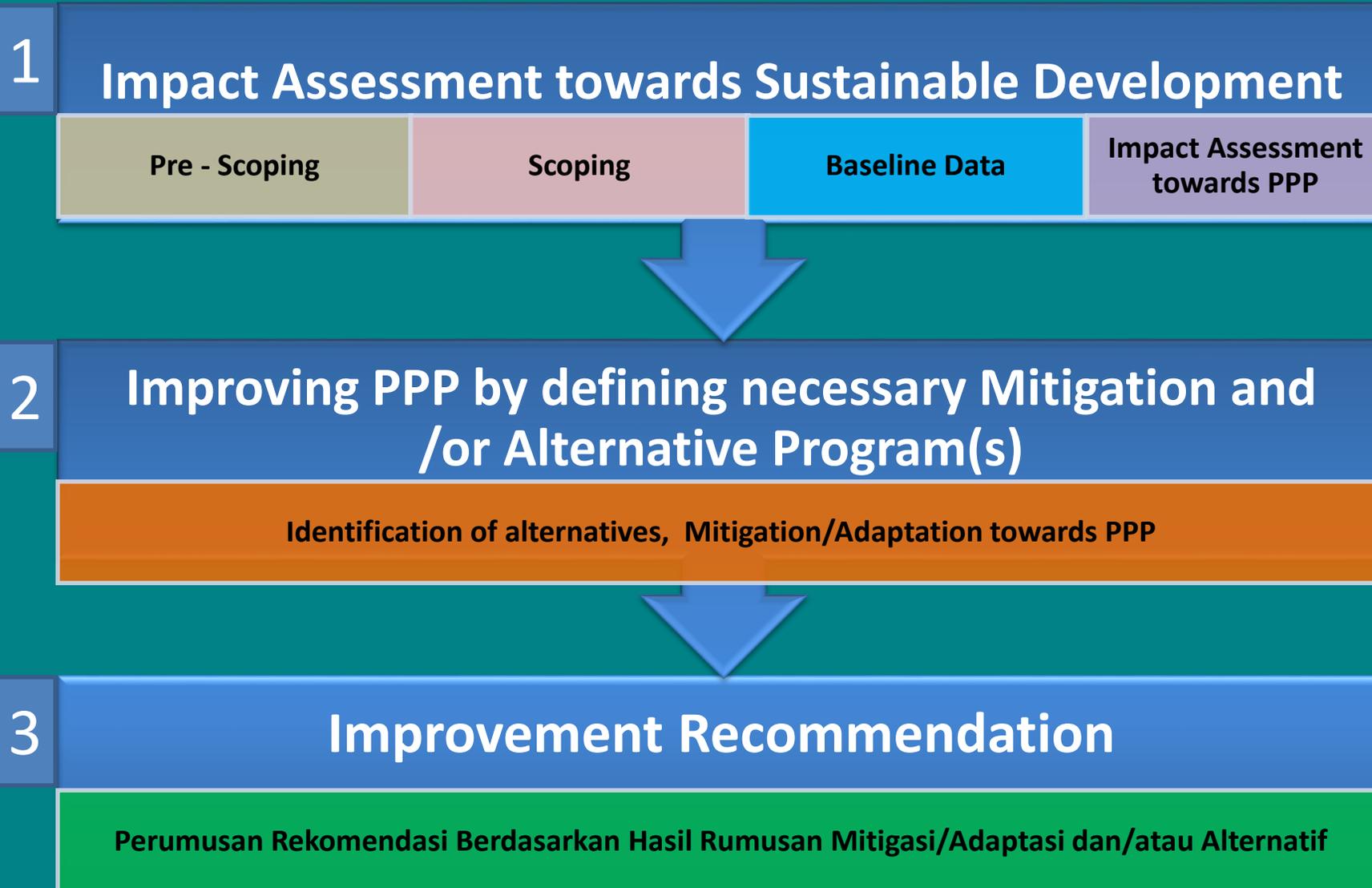
*) Other countries, such as the Netherland may have different methodology approach. In the Netherland, No 2 first then No. 1 where SEA is embed within the development of spatial plan . While in Indonesia, We do it as separate process and need more learning process. (from data to information, knowledge, wisdom and finally making decision)

1 **Impact Assessment towards Sustainable Development**

Pre - Scoping	Scoping	Baseline Data	Impact Assessment towards PPP

2 **Improving PPP by defining necessary Mitigation and /or Alternative Program(s)**

Identification of alternatives, Mitigation/Adaptation towards PPP

3 **Improvement Recommendation**

Perumusan Rekomendasi Berdasarkan Hasil Rumusan Mitigasi/Adaptasi dan/atau Alternatif

More Detail Steps in Implementing SEA

UU No. 32/2009	Permendagri No. 67/2014
1 Pengkajian pengaruh kebijakan, rencana, dan/atau program terhadap kondisi lingkungan hidup di suatu wilayah	❑ Melakukan persiapan dengan: (a) membentuk Pokja Pengendalian Lingkungan (PL); (b) menyusun KAK; merekrut Tenaga Ahli ❑ Melakukan pemetaan pemangku kepentingan ❑ Melakukan Pra Pelingkupan ❑ Melakukan Pelingkupan isu-isu strategis dan Analisis Baseline Data ❑ Mengidentifikasi kebijakan, rencana dan/atau program yang memiliki keterkaitan dengan isu-isu strategis ❑ **Mengkaji pengaruh** visi, misi, tujuan dan sasaran, strategi dan arah kebijakan, kebijakan umum dan program pembangunan daerah dan indikasi program prioritas RPJMD
2 Perumusan alternatif penyempurnaan kebijakan, rencana, dan/atau program	❑ Merumuskan mitigasi atau *counter programs* untuk meminimalkan potensi dampak negatif yang diperkirakan timbul (intensitas, persebaran, lokasi, lamanya berlangsung dan akumulasi) dan/atau mengusulkan alternatif
3 Rekomendasi perbaikan untuk pengambilan keputusan kebijakan, rencana, dan/atau program yang mengintegrasikan prinsip pembangunan berkelanjutan	❑ Merekomendasikan mitigasi dan/atau alternatif yang telah disepakati melalui proses pengambilan keputusan ❑ Mengintegrasikan hasil pengambilan keputusan ke dalam Rancangan Awal RPJMD ❑ Mendokumentasikan seluruh proses dan hasil pelaksanaan KLHS dalam suatu sistematika laporan dan mempubikasikannya kepada pemangku kepentingan

SEA Implementation within the process of making Local Development Plan Policy; an example of SEA is mandatory for any Development Plan and Spatial Plan Policy in Indonesia
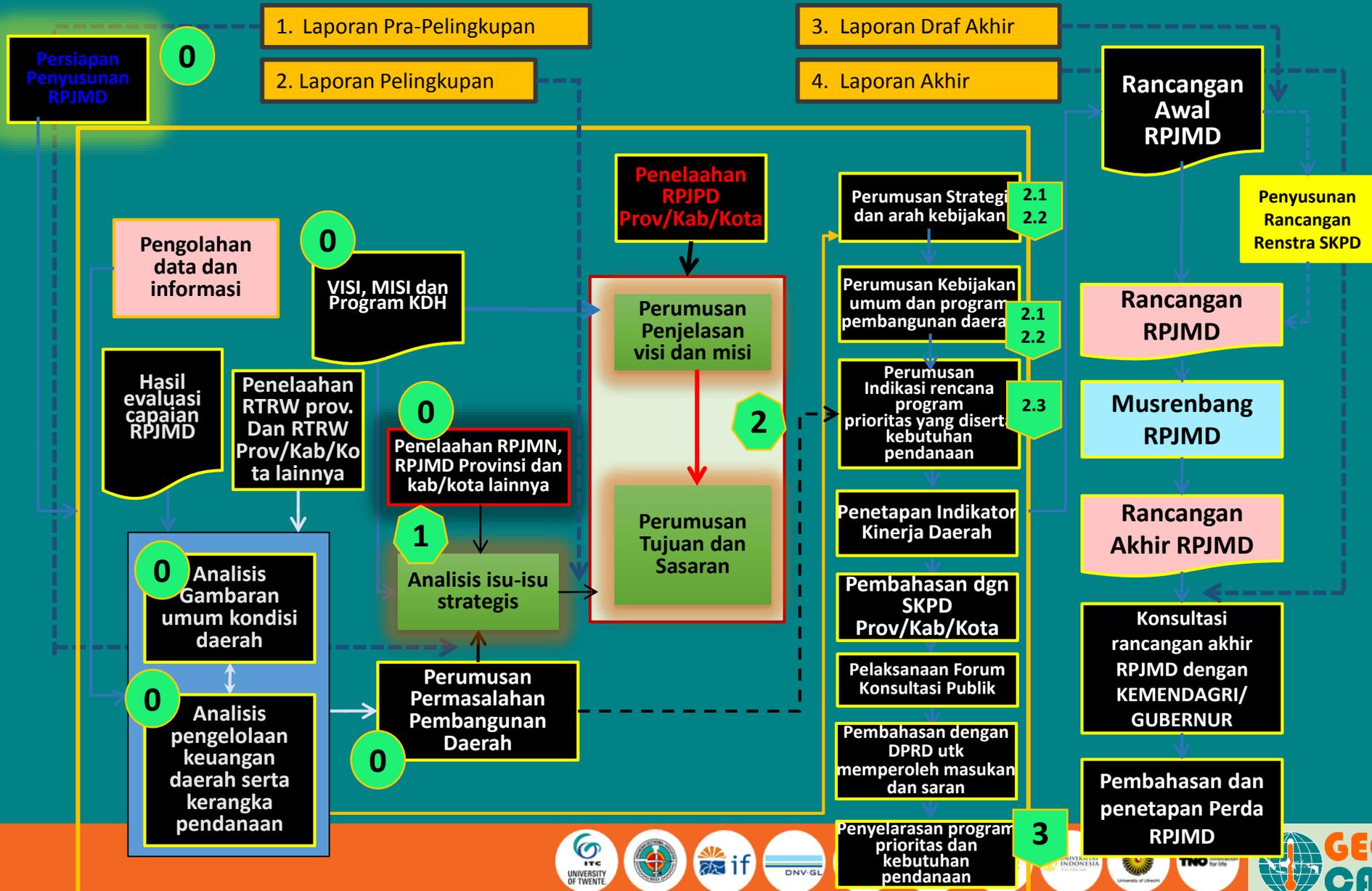
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Preparation
- SEA Team up Membentuk Pokja Pengendalian Lingkungan
- preparing work plan and budget

Pre-Scoping
- Longlisted strategical issues (socially, economically and environmentally)

1

Scoping
- Screening and making short listed strategic issues
- Developing baseline data

2

Impact Assessment
- Sustainable Strategic Issues (sensitives) toward PPP draft
- Defining Mitigation or Alternative for Policies Plan and Program concept betterment

Defining recommendation

Note: SEA team (task force) should ensure that mitigation/adaptation program (s) written as highly recommendation priority.

3

Integrating SEA Recommendation into the assessed PPP (Spatial Plan/ Development Plan) and making decision

Strategical issues covering:

1.	Across sector lines
2.	Across planning regions
3.	May creates negative impacts in the long run if there is no mitigation or adaptation or alternative program. ▪ It can disturb development process in certain region ▪ It can disturb sustainable development achievement
4.	Accumulative impacts and potentially develop multiple effects

An example of developing scenario, mitigation and alternative

Keinginan/ Kebijakan	Perencanaan Skenario	Program - Proyek	Prioritas	Mitigasi
Meningkatkan akses (arus barang dan manusia) P. Sumatera ke/dari P. Jawa	a. Peningkatan volume sampai > 10 % dalam 5 tahun b. Peningkatan volume arus 5-10% dalam 5 tahun	a. Bangun jembatan (jalan raya dan rel KA) b. Bangun terowongan c. Bangun transportasi air (Feri) d. Kombina	Butir **a , segera,** dana konsorsium	Tingkat kebijakan dan kelembagaan: Ditetapkan Badan Pengelola Trans Sumatera-Jawa (QA) Tingkat operasional: •Exit strategy (patchway) •Program K3 •QC mode transportasi •Jasa asuransi

Jika tidak ada alternatif program pembangunan

Jika tidak ada alternaatif mitigasi

Kaji ulang kelayakan perencanaan skenario dan/atau program-proyek

SEA Performance Criteria (IAIA, 2001)

SEA:

is integrated	• ensures an appropriate environmental assessment of all strategic decisions relevant for the achievement of sustainable development • addresses the interrelationships of biophysical, social and economic aspects • is tiered to policies in relevant sectors and, where appropriate, to project EIA and decision making
is sustainability-led	• facilitates identification of development options and alternative proposals that are more sustainable[1]
is focused	• provides sufficient, reliable and usable information for development planning and decision making •concentrates on key issues of sustainabldevelopment • is customised to the characteristics of the decision making process • is cost and time effective
is accountable	• is the responsibility of the leading agencies for the strategic decision to be taken • is carried out with professionalism, rigor fairness, impartiality and balance • is subject to independent checks and verification • documents and justifies how sustainability issues were taken into account in decision making
is participative	• informs and involves interested and affected publics and government bodies throughout the decision making process • explicitly addresses their inputs and concerns in documentation and decision making • has clear, easily understood information requirements and ensures sufficient access to all relevant information
is iterative	• ensures availability of the assessment results early enough to influence the decision making process and inspire future planning • provides sufficient information on the actual impacts of implementing a strategic decision to judge whether this decision should be amended

Harmonizing SEA and Green Economics Principles

Prinsip Ekonomi Hijau *Green Economy*; Dalal-Clayton (2012)	Prinsip KLHS (*Strategic Env. Assessment*); IAIA (2000)
1. **The Sustainable Principle**. A green, fair and inclusive economy is a means to deliver sustainability	1. **Sustainability-oriented**: *the process should facilitate* identification of development options and proposals that are environmentally sustainable
2. **The Justice Principle**. A green, fair and inclusive economy supports equity	2. **Practical**: *the process should provide information that is* required for decision-making
3. **The Dignity Principle**. A green, fair and inclusive economy creates genuine prosperity and wellbeing for all	3. **Integrated**: *the process should be related to parallel economic* and social appraisals and tiered to project EIA where appropriate
4. **Healthy Planet Principle**. A green, fair and inclusive economy restores lost biodiversity, invests in natural systems and rehabilitates those that are degraded	4. **Objective-led**: *the process should be undertaken with* reference to environmental goals and priorities
5. **The Inclusion Principle**. A green, fair and inclusive economy is inclusive and participatory in decision-making	5. **Transparent**: *the process should have clear, easily* understood information requirements including provision for public reporting
6. **The Good Governance and Accountability Principle**. A green, fair and inclusive economy is accountable	6. **Relevant**: *the process should be focus on issues that matter*
7. **The Resilience Principle**. A **green**, fair and inclusive economy contributes to economic, social and environmental resilience	7. **Cost-effective**: *the process should achieve its objectives* within limits of available information, time and issues
8. **The Efficiency and Sufficiency Principle**. A green, fair and inclusive economy delivers sustainable consumption and production	8. **Fit for purpose**: *the process should be customised to the* characteristics of policy and plan-making
9. **The Generations Principle**. A green, fair and inclusive economy invests for the present and the future	

Phases in SEA (OECD-DAC, 2006)

1. Establishing the context for SEA
   - Screening
   - Setting objectives
   - Identifying stakeholders
2. Implementing the SEA
   - Scoping (in dialogue with stakeholders)
   - Collecting baseline data
   - Identifying alternatives
   - How to enhance opportunities and mitigate negative impacts
   - Quality assurance
   - Reporting
3. Informing decision making
   - Make recommendations (in dialogue with stakeholders)
4. Monitoring and evaluation

SEA Report

Adapted into SEA Report for Spatial Plan and Development Plan Assessment local level

Exercise

1. Scoping (and Screening):
   a. Define Important Strategic Issues (top 5)
   b. Define strategic objectives (to cope with those issues)
   c. Define strategic alternatives to reach those objectives
2. Impact Analysis:
   a. Define geographic boundary of the GTE plan (e.g. Wayang windu)
   b. Define Baseline: Positioning in terms of Strategic Plan
   c. Compare alternatives
   d. Define Mitigation measures
   e. Defining Risks towards Sustainable Development (might come earlier??)
3. Recommendations

Literatures and data/information:
1. Articles and reports on GTE plant
2. Spatial plan Provincial/District level
3. Related Laws and regulations